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Attorneys for Mr. Jose Ambriz-Saucedo

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA
(HONORABLE BARRY T. MOSKOWITZ)

UNITED STATES OF AMERICA,)	CASE NO. 08CR0132-BTM
)	
Plaintiff,)	DATE: February 15, 2008
)	TIME: 1:30 p.m.
v.)	
)	NOTICE OF MOTIONS AND MOTIONS TO:
JOSE AMBRIZ-SAUCEDO,)	
)	1) PRESERVE EVIDENCE AND COMPEL
Defendant.)	DISCOVERY; AND
)	2) GRANT LEAVE TO FILE FURTHER
)	MOTIONS
)	
)	
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)	
)	
)	

TO: KAREN P. HEWITT, UNITED STATES ATTORNEY; AND
ANDREW SCHOPLER, ASSISTANT UNITED STATES ATTORNEY:

PLEASE TAKE NOTICE that, on February 15, 2008, at 1:30 p.m., or as soon thereafter as counsel may be heard, defendant Jose Ambriz-Saucedo, by and through his attorneys, Jennifer L. Coon and Federal Defenders of San Diego, Inc., will ask this Court to enter an order granting the following motions.

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MOTIONS

Defendant Jose Ambriz-Saucedo, by and through his attorneys, Jennifer L. Coon and Federal Defenders of San Diego, Inc., asks this Court pursuant to the United States Constitution, the Federal Rules of Criminal Procedure, and all other applicable statutes, case law, and local rules for an order to:

- (1) Preserve Evidence and Compel Discovery; and
- (2) Grant Leave to File Further Motions.

These motions are based upon the instant motions and notice of motions, the attached statement of facts and memorandum of points and authorities, the files and records in the above-captioned matter, and any and all other materials that may come to this Court's attention prior to or during the hearing of these motions.

Respectfully submitted,

DATED: February 1, 2008

/s/ Jennifer L. Coon

JENNIFER L. COON

Federal Defenders of San Diego, Inc.
Attorneys for Mr. Ambriz-Saucedo